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Interconnection - Implementing the Federal Act

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Discussion Points
Public Utility Commission of Texas
December 10, 1997**

[REDACTED]

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Arbitration Process

- Texas Commissioners held en banc arbitration hearings for the initial requests for arbitration with SWB. Additional petitions for arbitration have been filed at the Commission, involving GTE Southwest Incorporated and other petitions for arbitration with SWB. Commission staff serve as arbitrators on these matters.
- Post-interconnection disputes arising out of the implementation of either negotiated or arbitrated interconnection agreements are handled in an expedited proceeding. The arbitrator's decision is final unless a Commissioner places the arbitrator's decision on the Commission's open meeting agenda.

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Terms and Conditions for Resale, Access to the Unbundled Elements and OSS

- ILECs must provide nondiscriminatory access to unbundled network elements (UNEs)
 - CLECs may provide telecommunications service using 100% UNEs that are provided at TELRIC-based rates.
 - SWBT is required to connect UNEs on behalf of CLECs based on its waiver of its option to require CLECs to connect UNEs themselves. See Amendment and Clarification of Arbitration Award, November 25, 1997.
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Interconnection/Collocation

- Collocation is limited to equipment used for the purposes of interconnection or access to unbundled network elements.
 - Interconnection must be provided at any technically feasible point with quality at least equal to what the ILEC provides to itself.
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Resale

- SWBT's avoided cost discount is 21.6%. GTE-SW's avoided cost discount is 22.99%.

Numbering Issues

- Parties shall absorb their costs of providing interim number portability and shall work toward technological solutions to limit number exhaust.
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Operational and Technical Issues

- ILECs must provide real-time electronic interfaces that allow CLECs to perform preordering, ordering, provisioning, maintenance and repair, and billing for resale services and unbundled network elements. The functionality available to the CLEC when providing service using UNEs should be in parity with the functionality provided by the ILEC to itself when providing services using the same components of its network.
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Reciprocal Compensation/Termination of Traffic

- When a CLEC provides local service to an end user through resale, the ILEC is entitled to access revenues. When a CLEC provides local service to an end user through UNEs, the CLEC is entitled to access revenues.
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Use of TELRIC Methodology

- The Texas Commission independently determined that the TELRIC methodology is the appropriate methodology to obtain cost-based rates.
 - SWB's costing model was used; however, the inputs to that model were derived through arbitration
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INTERCONNECTION ISSUES AS A RESULT OF ARBITRATION PROCEEDINGS

PUBLIC UTILITY COMMISSION OF TEXAS

I. Arbitration Process

Pursuant to the authority vested by the Telecommunications Act of 1996 (FTA 96) the Public Utility Commission of Texas conducted arbitration proceedings for the purpose of resolving interconnection disputes and to assure successful implementation of interconnection agreements.

- Texas Commissioners served as arbitrators for the consolidated proceeding involving petitions for compulsory arbitration to interconnect with Southwestern Bell Telephone Company (SWBT). Petitioners included: AT&T Communications of the Southwest, Inc., MCI Telecommunications Corporation and its affiliate MCIMetro Access Transmission Services, Inc., Teleport Communications Group Inc., American Communications Services, Inc., and MFS Communications Company, Inc.
- Texas Commissioners held en banc arbitration hearings in September 1996, August 1997, and October 1997. The initial hearing addressed all major interconnection issues and established interim rates. The second phase of hearings addressed implementation issues and established final rates.
- A number of additional petitions for arbitration have been filed at the Commission, involving GTE Southwest Incorporated (GTE-SW) and other petitions for arbitration with SWBT. Commission staff serve as arbitrators on these matters.

Procedural rules for dispute resolution and approval of agreements were adopted by the Texas Commission (September 1996). These rules set out procedures for mediation, compulsory arbitration, and the review and approval of both negotiated and arbitrated interconnection agreements pursuant to the Commission's authority under the FTA 96.

- Rules provide for an expedited proceeding including prefiled direct testimony (no rebuttal) and limited cross-examination. Only parties to the negotiations participate in the arbitration hearing. Proceedings may be consolidated where appropriate to allow administrative efficiency.

- Commission staff serve as technical advisors to the Commissioners sitting as arbitrators. An administrative law judge (ALJ) assists the Commissioners with procedural matters, rules on disputed motions prior to the hearing and presides during the hearing.
- Prior to the filing of testimony, the parties provide the Commission with a joint list of the specific disputed issues for which a decision is required. This decision point list is used during the hearing for purposes of developing the evidentiary record.
- Hearing procedures are modified in the following fashion to further expedite the hearing process. Opposing parties do not present their cases in their entirety as is usually the case; rather, the hearing proceeds on an issue-by-issue order of presentation. For each issue, parties present their respective testifying witnesses in the form of a panel. Limited cross-examination is conducted in the panel format. At the conclusion of the cross-examination, all witnesses testifying on a particular issue take the stand and respond to the arbitrator's and staff's clarifying questions. Dialogue between opposing witnesses may be allowed to assist the arbitrator's understanding of the issues.
- The final decision of the arbitrator is set out in an arbitration award. The award contains a schedule for implementation of the terms and conditions of the award, including a date by which an agreement resulting from the arbitration is to be submitted to the Commission for review and approval.

II. Post-Interconnection Disputes

Disputes which arise after the parties have entered into an interconnection agreement are handled by the Texas Commission in accordance with procedures set out in the Commission's dispute resolution rule. Post-interconnection disputes arise out of the implementation of either negotiated or arbitrated interconnection agreements and may involve the proper interpretation or the enforcement of terms and conditions in the agreement. The Commission rules provide procedural options for the expedited resolution of these disputes. The Commission has delegated authority to its staff to arbitrate these proceedings. The arbitrator's decision is final unless a Commissioner places the arbitrator's decision on the Commission's open meeting agenda.

- Parties' procedural options include an informal settlement conference. Commission staff conduct the informal meeting between the parties and attempt to resolve the dispute informally by agreement.

- Alternatively, parties may petition the Commission for formal dispute resolution. Requests for relief may include a request for an interim ruling pending dispute resolution. If the arbitrator determines that the complaint warrants expedited ruling a hearing is held within three working days and interim relief is granted in 24 hours following the hearing. In order to qualify for expedited ruling a party must show that the dispute directly affects its ability to provide uninterrupted service to its customers or precludes the provisioning of any service, functionality, or network element.
- Upon the discretion of the arbitrator, proceedings for formal dispute resolution may be conducted according to a 30-day or a 60-day schedule. Proceedings involving only a single issue or which involve only legal issues may be resolved in 30 days. Proceedings which involve a number of issues, or complex issues and which will require discovery prior to an evidentiary hearing will require more time to complete. A hearing shall be commenced no later than 50 days after the filing of the complaint and a ruling will be issued no later than 15 days after the close of the hearing.

III. Highlights of Terms and Conditions for Resale, Access to the Unbundled Elements And Operational Support Systems

Unbundled Elements

Incumbent Local Exchange Carriers (ILECs) must provide access to the following unbundled network elements (UNEs) without restriction: (1) local loop (including subloop components such as feeder and distribution cable); (2) network interface devices; (3) local switching; (4) tandem switching; (5) interoffice transport; (6) signaling and call-related databases; (7) operations support systems; (8) operator services and directory assistance; and (9) cross-connect from SWBT's main distribution frame (MDF) to a Competing Local Exchange Carrier's (CLEC's) collocation space. When providing UNEs, ILECs must provide functionality comparable to the functionality obtained by the ILEC when using the same components. For example, SWBT when provisioning an unbundled switch, must offer unbundled local loops with and without automated testing and monitoring services. CLECs may not be required to own or control any of their own local exchange facilities before they can purchase or use unbundled elements to provide a telecommunications service.

Other UNE highlights include:

- ILECs must provide dark fiber in the feeder segment of the loop as an unbundled network element under certain conditions.
- ILECs must provide dark fiber in the dedicated interoffice transport segment of the network as an unbundled network element under certain conditions.

- ILECs must provide access to Digital Cross Connect Systems (DCS) functionality as an unbundled network element.
- CLECs may provide telecommunications service using 100% UNEs that are provided at TELRIC-based rates.
- SWBT is required to connect UNEs on behalf of CLECs based on its waiver of its option to require CLECs to connect UNEs themselves. *See Amendment and Clarification of Arbitration Award*, November 25, 1997.

Interconnection/Collocation

Determinations concerning interconnection/collocation include some of the following:

- Disputes regarding adequate space for collocation, whether in a central office, CEV, hut or cabinet, shall be resolved by a third party engineer.
- Collocation is limited to equipment used for the purposes of interconnection or access to unbundled network elements.
- Interconnection must be provided at any technically feasible point with quality at least equal to what the ILEC provides to itself.
- ILECs must provide access to poles, ducts and conduits upon the same criteria that the ILEC provides to itself.

Resale

Determinations concerning resale include some of the following:

- The wholesale discount does not apply to promotions of 90 days or less, but does apply to promotions greater than 90 days.
- SWBT is not required to provide a “fresh look” for its customers currently under term plans.

Numbering Issues

The Commission has encouraged the parties to the arbitrations to develop methods for number assignment that would minimize number exhaust. Other determinations concerning numbering issues include some of the following:

- Parties are to absorb their own costs of providing Interim Number Portability.

- Meet-point billing arrangements are to allow the forwarding carrier to retain any applicable terminating fees (but not any other portion of the switched access charges such as Carrier Common Line and Switching-related charges).

Operational and Technical Issues

Determinations concerning operational and technical issues include some of the following:

- ILECs must provide real-time electronic interfaces that allow CLECs to perform preordering, ordering, provisioning, maintenance and repair, and billing for resale services and unbundled network elements. The functionality available to the CLEC when providing service using UNEs should be in parity with the functionality provided by the ILEC to itself when providing services using the same components of its network.
- The ILEC must maintain information that is necessary to evaluate its compliance with performance standards established in the interconnection agreements.
- SWBT must provide AIN customized routing to CLECs wishing to use their own OS/DA platforms.
- The ILEC must unbrand its customer services when acting on behalf of a CLEC.
- Based on SWBT's waiver of its right to require CLECs to combine UNEs themselves, performance standards were established that compare SWBT's performance when provisioning UNEs to SWBT's performance when provisioning the same network components to itself. It is not clear at this time in what manner the 8th Circuit's orders will affect the GTE-SW interconnection agreements.
- A CLEC's 9-1-1 trunks must receive the same level of priority service restoration as the ILEC provides itself.

IV. Costing and Pricing Issues

Avoided Cost Discount

Determinations concerning the avoided cost discount include some of the following:

- An aggregate avoided cost methodology was adopted that creates an average avoided cost, as opposed to a service-by-service avoided cost discount.
- ARMIS data was used, in large part, to calculate the avoided cost discount.

- No additional adjustment was made to the avoided cost discount calculation to account for wholesale onset costs. Wholesale onset costs are incorporated into the avoided cost discount as part of the ten (10) percent that is not avoided in accounts 6611, 6612, 6613 and 6623.
- The avoided cost discount for SWBT is 21.6%.
- The avoided cost discount for GTE-SW is 22.99%.

Reciprocal Compensation for Transport and Termination of Traffic

Determinations concerning reciprocal compensation include some of the following:

- When a CLEC provides local service to an end user through resale, the ILEC is entitled to access revenues.
- When a CLEC provides local service to an end user through UNEs, the CLEC is entitled to access revenues.
- When the ILEC and CLEC jointly provide switched access service to an IXC, switched access revenues should be shared according to the companies' meet point billing arrangements.

Physical Collocation Rates

Determinations concerning the prices of UNEs/Interconnection/Collocation include some of the following:

- TELRIC methodology shall be used for costing UNEs.¹
- Prices for interconnection items that are not UNEs (e.g., certain billing, collecting and remitting functions) need not be based on TELRIC. These rates are generally set at 75% of what SWBT currently charges other ILECs for these services.
- SWBT may charge CLECs nonrecurring charges for combining UNEs even when those UNEs were previously combined because SWBT has the right, based on the 8th Circuit's Order, to uncombine previously combined elements.
- The ILECs costing methodologies are to be used to determine TELRIC rates. TELRIC principals are to be used to determine the proper inputs. The determination to use ILEC

¹ The Commission set rates for all UNEs and services necessary for interconnection with SWBT at the December 1, 1997 Open Meeting and will finalize the approval of these rates, revised as necessary, at the December 17, 1997 Open Meeting.

costing methodologies was conditioned upon the ILECs' willingness to sufficiently open up their models to CLECs to allow the CLECs to understand the model and propose alternative inputs.

- The Common Cost Allocator of 13.1% was determined using SWBT's general overhead expenses and revenues, as reported in ARMIS, and is applied to all UNE TELRICs in determining rates.
- A table is attached which lists various inputs authorized by the Commission to be used in setting SWBT's rates for UNEs.
- Interim rates are currently in effect for GTE-SW. Permanent rates for SWBT were ordered by the Commission at the December 1, 1997 open meeting and will be finalized, including revisions, at the December 17, 1997 open meeting. Permanent rates will be set for GTE-SW after a hearing scheduled to be held in March 1998.
- Rates for collocation are currently under review and will be set at the December 17, 1997 open meeting.

Costing and Pricing of Unbundled Network Elements

- Use of TELRIC:

The rates for UNEs on the attached rate schedule are TELRIC-based. TELRIC, or Total Element Long Run Increment Cost, is defined as incremental cost, being those additional costs that a firm will incur as a result of expanding the output of a good or service by producing an additional quantity of the good or service. These rates are based on costs calculated by applying SWBT's costing methodology and using inputs ordered by the Texas Commission. After the appropriate cost for each UNE was determined, a 13.1% Common Cost Allocation Factor was applied. The resulting rate, being based on cost models and cost model inputs that reflect long-run, efficient conditions, reflects the forward-looking economic cost (including return on capital) to SWBT for providing the UNE.

Some of the rates on the attached rate sheet apply to services, rather than UNEs, because in some instances, services are necessary for interconnection. Generally, cost studies were not filed for these services by either party. In such cases, there has been no determination made as to whether or not these service rates are either TELRIC-based or reflect the forward-looking economic cost to SWBT for providing the service.

Summary of Costing Issues

Top 20 Costing Input Issues the Texas PUC Addressed in the SWBT Mega-Arbitration (not in order of significance):

Item #	Description	Comments ²
1	Switch processor fill	90%
2	Loop feeder cable fill	79.2% for underground, 75% for buried and aerial
3	Loop distribution cable fill	40% to reflect service quality requirements
4	STP processor fill	80% of 40%, or 32% per pair.
5	Cost of Capital	10.36%
6	Depreciation lives	Based on the latest FCC-approved lives
7	Inflation factors	None were allowed. The productivity of the industry was assumed to negate the effects of inflation.
8	Sharing of poles and conduits	Assumed 22% of poles are shared and 33% of conduits are shared, so adjusted SWBT's investments down to reflect this.
9	2-wire vs. 4-wire loop costs	4W loop costs are not simply twice 2W costs. They are usually less, reflecting the fact that some distribution cable investment is duplicated even for 2W services b/c of service quality requirements.
10	IDLC and breakpoint assumptions/loop design standards	Assumed that loops over 12KF need DLC and that 25% of these used IDLC.
11	Labor costs *	Adjusted labor rates down to correct for erroneous assignment of some costs to certain personnel. Also, adjusted some labor times and percentages of occurrence down to reflect forward-looking assumptions.
12	Switch discounts*	Adjusted SWBT's rates to account for replacement-based discounts, not growth-and-replacement-based.

² Items followed by an asterisk were ordered upon implicitly by the approval of the rates at the December 1, 1997 Open Meeting. The final rates, including revisions, will be set at the December 17, 1997 Open Meeting. All other items were approved explicitly as part of the original arbitration award (Phase I).

13	TS/NTS reallocation*	Assigned much of the switch processor investment to the NTS category as lines generally exhaust first.
14	Loop sample*	Its hard to know exactly how this affected the costs, but we made SWBT do a new random sample of loops to ensure loops from all WCs had an equal chance of being included.
15	Conduit and pole investment*	Assumed replacement cost instead of SWBT's placement cost. Replacement cost in this case was based on SWBT data, but reflected more economies of scale than SWBT's placement costs.
16	DS1/3 weighting*	SWBT did their DS3 transport study using DS1s as a surrogate for DS3s. We didn't think that was accurate and applied a weighting factor to adjust.
17	OS equipment fill factors*	Many of SWBT's were too low and/or double-counted fill. SWBT's witness was unaware of the double-counting and generally unknowledgable, so we went with petitioners.
18	Building and power investment factors*	Adjusted/applied them given SWBT and petitioner testimony. Generally, they fell.
19	Depreciation planning period*	Assumed 99 years, as SWBT has always done, not the 3 years they used only in their arbitration studies.
20	Common cost allocator*	13.1% based on a formula of $CC/(revenues-CC)$.

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
3	Network Interface Device			
4	Disconnect Loop from inside wiring, per NID	None	\$14.32	\$14.32
5	Unbundled Loops			
6	2W Analog Zone 1	\$ 18.98	\$ 18.03	\$ 6.22
7	2W Analog Zone 2	\$ 13.86	\$ 15.03	\$ 6.22
8	2W Analog Zone 3	\$ 12.14	\$ 15.03	\$ 6.22
9	2W Analog Statewide	\$ 14.16	\$ 15.03	\$ 6.22
10	Conditioning for dB Loss	\$ 6.03	\$ 17.84	\$ 18.13
11	4W Analog Zone 1	\$ 36.06	\$ 15.03	\$ 6.22
12	4W Analog Zone 2	\$ 21.82	\$ 15.03	\$ 6.22
13	4W Analog Zone 3	\$ 15.86	\$ 15.03	\$ 6.22
14	4W Analog Statewide	\$ 19.41	\$ 15.03	\$ 6.22
15	2W Digital Zone 1	\$ 46.09	\$ 15.03	\$ 6.22
16	2W Digital Zone 2	\$ 37.64	\$ 15.03	\$ 6.22
17	2W Digital Zone 3	\$ 34.91	\$ 15.03	\$ 6.22
18	2W Digital Statewide	\$ 38.24	\$ 15.03	\$ 6.22
19	4W Digital Zone 1	\$ 75.96	\$ 73.26	\$ 28.88
20	4W Digital Zone 2	\$ 75.81	\$ 73.26	\$ 28.88
21	4W Digital Zone 3	\$ 76.22	\$ 73.26	\$ 28.88
22	4W Digital Statewide	\$ 78.16	\$ 73.26	\$ 28.88
23	Loop Cross Connects (with testing unless otherwise noted)			
24	Analog Loop to Collo 2W (same CO)	\$ 1.24	\$ 4.72	\$ 4.72
25	Analog Loop to Collo 2W w/o testing (same CO)	\$ -	\$ 6.91	\$ 4.97
26	Analog Loop to Collo 4W (same CO)	\$ 2.49	\$ 28.88	\$ 28.88
27	Analog Loop to Collo 4W w/o testing (same CO)	\$ -	\$ 28.88	\$ 28.88
28	Digital Loop to Collo 2W (same CO)	\$ 1.24	\$ 4.72	\$ 4.72
29	Digital Loop to Collo 2W w/o testing (same CO)	\$ -	\$ 6.91	\$ 4.97
30	Digital Loop to Collo 4W (same CO)	\$ 6.67	\$ 28.88	\$ 24.18
31	Digital Loop to Collo 4W w/o testing (same CO)	\$ -	\$ 28.04	\$ 28.04

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
32	Analog Loop to Collo/Mux 2W (dft CO)	\$ 2.81	\$ 19.32	\$ 19.00
33	Analog Loop to Collo/Mux 2W w/o testing (dft CO)	\$ -	\$ 19.32	\$ 19.00
34	Analog Loop to Collo/Mux 4W (dft CO)	\$ 3.81	\$ 53.42	\$ 53.10
35	Analog Loop to Collo/Mux 4W w/o testing (dft CO)	\$ -	\$ 53.42	\$ 53.10
36	Digital Loop to Collo/Mux 2W (dft CO)	\$ 4.43	\$ 19.32	\$ 19.00
37	Digital Loop to Collo/Mux 2W w/o testing (dft CO)	\$ -	\$ 19.32	\$ 19.00
38	Digital Loop to Collo/Mux 4W (dft CO)	\$ 7.51	\$ 22.03	\$ 19.28
39	Digital Loop to Collo/Mux 4W w/o testing (dft CO)	\$ 0.81	\$ 22.49	\$ 19.87
40	Analog Loop to DCS 2W	\$ 0.27	\$ 20.85	\$ 19.80
41	Analog Loop to DCS 4W	\$ 0.54	\$ 20.85	\$ 19.80
42	Digital Loop to DCS 2W	\$ 2.84	\$ 20.85	\$ 19.80
43	Digital Loop to DCS 4W	\$ 8.29	\$ 28.95	\$ 28.47
44	DS3 Loop to DCS	\$ 225.89	\$ -	\$ -
45	Analog Loop to Switch Port	\$ -	\$ 4.17	\$ 3.29
46	Digital Loop to Switch Port 2W	\$ -	\$ 9.40	\$ 9.40
47	Digital Loop to Switch Port 4W	\$ 7.51	\$ 37.88	\$ 37.88
48	Subloop Feeder			
49	DS1 4W Copper Zone 1	\$ 52.75	\$ 73.25	\$ 25.88
50	DS1 4W Copper Zone 2	\$ 52.84	\$ 73.25	\$ 25.88
51	DS1 4W Copper Zone 3	\$ 52.88	\$ 73.25	\$ 25.88
52	DS1 4W Copper Statewide	\$ 52.84	\$ 73.25	\$ 25.88
53	Dark Fiber Foot Zone 1	\$ 0.00440	\$ 182.39	\$ 31.11
54	Dark Fiber Foot Zone 2	\$ 0.00385	\$ 182.39	\$ 31.11
55	Dark Fiber Foot Zone 3	\$ 0.00377	\$ 182.39	\$ 31.11
56	Dark Fiber Foot Statewide	\$ 0.00391	\$ 182.39	\$ 31.11
57	DS1 Virtual (TR303 IDLC)	None	\$ 28.28	\$ 28.28

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
58	Subloop Distribution			
59	2W Analog Zone 1	\$ 9.46	\$ 16.03	\$ 6.22
60	2W Analog Zone 2	\$ 5.99	\$ 16.03	\$ 6.22
61	2W Analog Zone 3	\$ 4.22	\$ 16.03	\$ 6.22
62	2W Analog Statewide	\$ 6.78	\$ 16.03	\$ 6.22
63	4W Analog Zone 1	\$ 9.81	\$ 16.03	\$ 6.22
64	4W Analog Zone 2	\$ 6.63	\$ 16.03	\$ 6.22
65	4W Analog Zone 3	\$ 4.36	\$ 16.03	\$ 6.22
66	4W Analog Statewide	\$ 6.97	\$ 16.03	\$ 6.22
67	2W Digital Zone 1	\$ 12.98	\$ 16.03	\$ 6.22
68	2W Digital Zone 2	\$ 9.01	\$ 16.03	\$ 6.22
69	2W Digital Zone 3	\$ 7.86	\$ 16.03	\$ 6.22
70	2W Digital Statewide	\$ 9.36	\$ 16.03	\$ 6.22
71	4W Digital Zone 1	\$ 7.93	\$ 16.03	\$ 6.22
72	4W Digital Zone 2	\$ 6.41	\$ 16.03	\$ 6.22
73	4W Digital Zone 3	\$ 4.68	\$ 16.03	\$ 6.22
74	4W Digital Statewide	\$ 6.90	\$ 16.03	\$ 6.22
75	Subloop Concentrator/ Mux	ICB	ICB	ICB
76	Subloop Cross Connect			
77	2W	\$ -	\$ 79.80	\$ 48.36
78	4W	\$ -	\$ 79.80	\$ 80.80
79	Dark Fiber	\$ 1.71	\$65.87	\$48.44
80	Local Switching			
81	Temporary Structure w/in a CO	\$ 0.0015074	None	None
82	Temporary Structure b/t COs	\$ 0.0024144	None	None
83	Standard/Per Orig. or Term. MOU (excluding port) - Level 1	\$ 0.0021199	None	None
84	Standard/Per Orig. or Term. MOU (excluding port) - Level 2	\$ 0.0011873	None	None
85	Standard/Per Orig. or Term. MOU (excluding port) - Level 3	\$ 0.0012891	None	None
86	Standard/Per Orig. or Term. MOU (excluding port) - Level 4	\$ 0.0014244	None	None
87	Standard/Per Orig. or Term. MOU (excluding port) - Statewide	\$ 0.0015074	None	None
88	NTS Hardware - Under 10K Lines - per MOU	\$ -	None	None

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff MRate 1st (13.1% CC)	Staff MRate Add'l (13.1% CC)
89	NTS Hardware - Under 10-20K Lines - per MOU	\$ -	None	None
90	NTS Hardware - Under 20-40K Lines - per MOU	\$ -	None	None
91	NTS Hardware - Over 40K Lines - per MOU	\$ -	None	None
92	NTS Hardware - Shrd. Avg. - per MOU	\$ -	None	None
93	Customized Routing Rebate All			
94	Per customer line*	\$ 0.18	None	None
95	Per end office (unless previously changed under UNE)*	None	\$ 86.00	\$ 86.00
96	SOAC Table Work (unless previously changed under UNE)*	None	\$ 6,201.00	\$ 6,201.00
97	Development 1st LSP*	None	\$ 280,646.00	None
98	Development Subseq LSP	None	ICB	None
99	Customized Routing Rebate LOC			
100	Per customer line*	\$ 0.18	None	None
101	Per end office (unless previously changed under UNE)*	None	\$ 86.00	\$ 86.00
102	SOAC Table Work (unless previously changed under UNE)*	None	\$ 6,201.00	\$ 6,201.00
103	Customized Routing UNE All			
104	Per query per customer line*	\$ 0.0002332	None	None
105	SOAC Work Table*	None	\$ 7,180.20	\$ 7,180.20
106	Per end office*	None	\$ 86.10	\$ 86.10
107	Per Carrier-like Customer*	None	\$ 123.80	\$ 123.80
108	Development 1st LSP*	None	\$273,918.32	None
109	Development Subseq LSP	None	ICB	None
110	Customized Routing UNE LOC			
111	Per query per customer line*	\$ 0.0002332	None	None
112	SOAC Work Table*	None	\$ 7,180.20	\$ 7,180.20
113	Per end office*	None	\$ 86.10	\$ 86.10
114	Per Carrier-like Customer*	None	\$ 123.80	\$ 123.80

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
115	Call Blocking/ Screening for LCC	None	\$ -	None
116	Ports			
117	Analog Line Port Level 1	\$ 4.21	\$ 1.27	\$ 1.27
118	Analog Line Port Level 2	\$ 3.06	\$ 1.27	\$ 1.27
119	Analog Line Port Level 3	\$ 2.47	\$ 1.27	\$ 1.27
120	Analog Line Port Level 4	\$ 1.88	\$ 1.27	\$ 1.27
121	Analog Line Port Statewide	\$ 2.90	\$ 1.27	\$ 1.27
122	BRI Line Port Level 1	\$ 4.77	\$ 5.36	\$ 5.36
123	BRI Line Port Level 2	\$ 4.77	\$ 5.36	\$ 5.36
124	BRI Line Port Level 3	\$ 4.77	\$ 5.36	\$ 5.36
125	BRI Line Port Level 4	\$ 4.77	\$ 5.36	\$ 5.36
126	BRI Line Port Statewide	\$ 4.77	\$ 5.36	\$ 5.36
127	PRI Line Port Level 1	\$ 131.93	\$ 235.87	\$ 129.22
128	PRI Line Port Level 2	\$ 131.93	\$ 235.87	\$ 129.22
129	PRI Line Port Level 3	\$ 131.93	\$ 235.87	\$ 129.22
130	PRI Line Port Level 4	\$ 131.93	\$ 235.87	\$ 129.22
131	PRI Line Port Statewide	\$ 131.93	\$ 235.87	\$ 129.22
132	Analog DID Trunk Port	\$ 8.22	\$ 80.04	\$ 80.04
133	2W Analog Trunk Port - D4 Channel Bank	\$ 0.47	\$ 0.019	\$ 0.019
134	DS1 Trunk Port	\$ 81.62	\$ 89.952	\$ 63.607
135	EAS Port Additive per MOU*	\$0.0244 or \$0.0355 per MOU	None	None
136	Feature Activation per Analog Port Type			
137	Call Waiting	None	\$ 0.05	None
138	Call Forwarding Variable	None	\$ 0.05	None
139	Call Forwarding Busy Line	None	\$ 0.05	None
140	Call Forwarding Don't Answer	None	\$ 0.05	None
141	Three-Way Calling	None	\$ 0.05	None
142	Speed Calling 8	None	\$ 0.05	None
143	Speed Calling 30	None	\$ 0.05	None
144	Auto Callback/Auto Redial	None	\$ 0.05	None
145	Distinctive Ring/Priority Call	None	\$ 0.05	None
146	Selective Call Rejection/Call Blocker	None	\$ 0.05	None
147	Auto Recall/Call Return	None	\$ 0.05	None
148	Selective Call Forwarding	None	\$ 0.05	None

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff MRORate 1st (13.1% CC)	Staff MRORate Addtl (13.1% CC)
149	Calling # Delivery	None	\$ 0.06	None
150	CNAM Delivery	None	\$ 0.06	None
151	Calling Number/Name	None	\$ 0.06	None
152	Blocking	None	\$ 0.06	None
152	Anonymous Call	None	\$ 0.06	None
153	Rejection	None	\$ 0.06	None
153	Feature Activation per analog arrangement		\$ 0.06	
154	Personalized Ring	None	\$ 0.06	None
155	Hunting Arrangement	None	\$ 0.06	None
156	Feature Activation per successful occurrence		\$ 0.06	
157	Call Trace (per feature per port)	None	\$ 0.06	None
158	Call Trace (per successful occurrence per port)	None	\$ 0.06	None
159	ISDN BRI Port Features			
160	CSV/CSD per B channel	None	\$ 0.06	None
161	Basic ECTS per B channel	None	\$ 0.06	None
162	CACH ECTS per B channel	None	\$ 0.12	None
163	ISDN PRI Port Features			
164	CSV/CSD per B channel	None	\$ 0.06	None
165	Backup D Channel	None	\$ 31.62	None
166	CNAM Delivery	None	\$ -	None
167	Dynamic Channel Allocation	None	\$ 6.17	None
168	Analog DID Trunk Port			
169	DID #s - Initial 100 #s*	None	\$ 130.21	\$ 11.23
170	DID #s - Initial 10 #s*	None	\$ 123.66	\$ 5.60
171	D31 Digital Trunk Port DID			
172	DID #s - Initial 100 #s*	None	\$ 130.21	\$ 11.23
173	DID #s - Initial 10 #s*	None	\$ 123.66	\$ 5.60
174	Centrex-like System Charge			
	System Establishment per serving office - Analog Only	None	\$ 371.71	\$ 21.76
175	System Establishment per serving office - Analog/ISDN BRI Mix*	None	\$ 430.62	\$ 96.67
176	System Establishment per serving office - ISDN BRI Only	None	\$ 118.71	\$ 47.76
177	System Subscrip Conversion per serving office - Add Analog to existing ISDN BRI only system	None	\$ 286.16	None
178				

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
179	System Subscrip Conversion per serving office - Add ISDN to existing Analog only system	None	\$ 128.25	None
180	Analog Port Features			
181	Standard feature initialization per analog port	None	\$ 0.05	N/A
182	Auto Callback Calling/Business Group Callback	None	\$ 0.05	N/A
183	Call Forwarding Variable/ Business Group Call Forwarding Variable	None	\$ 0.05	N/A
184	Call Forwarding Busy Line	None	\$ 0.05	N/A
185	Call Forwarding Don't Answer	None	\$ 0.05	N/A
186	Call Hold	None	\$ 0.05	N/A
187	Call Pickup	None	\$ 0.05	N/A
188	Call Transfer - All Calls	None	\$ 0.05	N/A
189	Call Waiting - Intragroup/Business Call Forwarding Var.	None	\$ 0.05	N/A
190	Call Waiting - Orig.	None	\$ 0.05	N/A
191	Call Waiting - Term.	None	\$ 0.05	N/A
192	Class of Service Restr. - Fully	None	\$ 0.05	N/A
193	Class of Service Restr. - Semi	None	\$ 0.05	N/A
194	Class of Service Restr. - Toll	None	\$ 0.05	N/A
195	Consult. Hold*	None	\$ 0.05	N/A
196	Dial Call Waiting	None	\$ 0.05	N/A
197	Directed Call Pickup - Non Barge in	None	\$ 0.05	N/A
198	Directed Call Pickup - With Barge in	None	\$ 0.05	N/A
199	Distinctive Ring and Call Waiting Tone	None	\$ 0.05	N/A
200	Hunting Arrgmt - Basic	None	\$ 0.05	N/A
201	Hunting Arrgmt - Circular	None	\$ 0.05	N/A
202	Speed Calling Personal	None	\$ 0.05	N/A
203	Three Way Calling	None	\$ 0.05	N/A
204	Voice/Data Protection	None	\$ 0.05	N/A
205	ISDN (BRI) Port Features			
206	CSV per B channel	None	\$ 0.09	N/A
207	CSD per B channel	None	\$ 0.09	N/A
208	Standard feature initialization per ISDN BRI port	None	\$ 1.47	N/A

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
209	Add'l Call Offering for CSV	None	\$ 1.47	N/A
210	Call Forwarding Busy Line	None	\$ 1.47	N/A
211	Call Forwarding Don't Answer	None	\$ 1.47	N/A
212	Call Forwarding Variable	None	\$ 1.47	N/A
213	Call Hold	None	\$ 1.47	N/A
214	Call Pickup	None	\$ 1.47	N/A
215	Call Transfer - All Calls	None	\$ 1.47	N/A
216	Class of Service Restr. - Fully	None	\$ 1.47	N/A
217	Class of Service Restr. - Semi	None	\$ 1.47	N/A
218	Class of Service Restr. - Toll	None	\$ 1.47	N/A
219	Consult. Hold	None	\$ 1.47	N/A
220	Dial Call Waiting	None	\$ 1.47	N/A
221	Directed Call Pickup - Non Barge in	None	\$ 1.47	N/A
222	Directed Call Pickup - With Barge in	None	\$ 1.47	N/A
223	Distinctive Ringing	None	\$ 1.47	N/A
224	Hunting Arrgmt - Basic	None	\$ 1.47	N/A
225	Hunting Arrgmt - Circular	None	\$ 1.47	N/A
226	Speed Calling Personal	None	\$ 1.47	N/A
227	Three Way Calling	None	\$ 1.47	N/A
228	Custom Access Treatment Code	None	\$ 1.47	N/A
229	Denied Orig.	None	\$ 1.47	N/A
230	Denied Term.	None	\$ 1.47	N/A
231	Intercom Dialing	None	\$ 1.47	N/A
232	Tandem Switching			
233	Per MOU per call	\$ 0.000734	None	None
234	Blended Transport			
235	Per MOU	\$ 0.000389	None	None
236	Common Transport			
237	Termination MOU Zone 3 (Urban)	\$ 0.000123	None	None
238	Termination MOU Zone 2 (Suburban)	\$ 0.000135	None	None
239	Termination MOU Zone 1 (Rural)	\$ 0.000144	None	None
240	Termination MOU Interzone (Zone 4)	\$ 0.000187	None	None
241	Termination MOU Statewide Avg.	\$ 0.000135	None	None
242	Facility Mile MOU Zone 3 (Urban)	\$ 0.0000911	None	None

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
243	Facility Mile MOU Zone 2 (Suburban)	\$ 0.0000032	None	None
244	Facility Mile MOU Zone 1 (Rural)	\$ 0.0000101	None	None
245	Facility Mile MOU Interzone (Zone 4)	\$ 0.0000033	None	None
246	Facility Mile MOU Statewide Avg.	\$ 0.0000021	None	None
247	Dedicated Transport			
248	DS1 Entrance Facilities	\$ -	\$ -	\$ -
249	DS3 Entrance Facilities	\$ -	\$ -	\$ -
250	OC3 Entrance Facilities	\$ -	\$ -	\$ -
251	OC12 Entrance Facilities	\$ -	\$ -	\$ -
252	VG Interoffice Transport Urban Term.	\$ 12.74	\$87.06	\$ 99.48
253	VG Interoffice Transport Suburban Term.	\$ 12.89	\$87.06	\$ 99.48
254	VG Interoffice Transport Rural Term.	\$ 13.28	\$87.06	\$ 99.48
255	VG Interoffice Transport Interzone Term.	\$ 13.87	\$87.06	\$ 99.48
256	VG Interoffice Transport Urban Mile	\$ 0.011	Same as for Term.	Same as for Term.
257	VG Interoffice Transport Suburban Mile	\$ 0.057	Same as for Term.	Same as for Term.
258	VG Interoffice Transport Rural Mile	\$ 0.113	Same as for Term.	Same as for Term.
259	VG Interoffice Transport Interzone Mile	\$ 0.057	Same as for Term.	Same as for Term.
260	DS1 Interoffice Transport - Urban Term.	\$ 28.18	\$ 174.43	\$ 190.98
261	DS1 Interoffice Transport - Suburban Term.	\$ 41.24	\$ 174.43	\$ 190.98
262	DS1 Interoffice Transport - Rural Term.	\$ 44.48	\$ 174.43	\$ 190.98
263	DS1 Interoffice Transport - Interzone Term.	\$ 57.48	\$ 174.43	\$ 190.98
264	DS1 Interoffice Transport - Urban Mile	\$ 0.35	Same as for Term.	Same as for Term.
265	DS1 Interoffice Transport - Suburban Mile	\$ 0.94	Same as for Term.	Same as for Term.
266	DS1 Interoffice Transport - Rural Mile	\$ 3.11	Same as for Term.	Same as for Term.
267	DS1 Interoffice Transport - Interzone Mile	\$ 1.83	Same as for Term.	Same as for Term.
268	DS3 Interoffice Transport - Urban Term.	\$ 417.24	\$170.28	\$130.07
269	DS3 Interoffice Transport - Suburban Term.	\$ 452.03	\$170.28	\$130.07
270	DS3 Interoffice Transport - Rural Term.	\$ 692.87	\$170.28	\$130.07

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
271	DS3 Interoffice Transport - Interzone Term.	\$ 794.49	\$ 179.28	\$ 139.07
272	DS3 Interoffice Transport - Urban Mile	\$ 9.29	Same as for Term.	Same as for Term.
273	DS3 Interoffice Transport - Suburban Mile	\$ 18.18	Same as for Term.	Same as for Term.
274	DS3 Interoffice Transport - Rural Mile	\$ 68.89	Same as for Term.	Same as for Term.
275	DS3 Interoffice Transport - Interzone Mile	\$ 14.43	Same as for Term.	Same as for Term.
276	OC3 Interoffice Transport - Urban Term.	\$ 1,381.04	\$ 562.41	\$ 276.80
277	OC3 Interoffice Transport - Suburban Term.	\$ 1,481.22	\$ 562.41	\$ 276.80
278	OC3 Interoffice Transport - Rural Term.	\$ 2,188.84	\$ 562.41	\$ 276.80
279	OC3 Interoffice Transport - Interzone Term.	\$ 2,878.91	\$ 562.41	\$ 276.80
280	OC3 Interoffice Transport - Urban Mile	\$ 27.86	Same as for Term.	Same as for Term.
281	OC3 Interoffice Transport - Suburban Mile	\$ 48.47	Same as for Term.	Same as for Term.
282	OC3 Interoffice Transport - Rural Mile	\$ 176.78	Same as for Term.	Same as for Term.
283	OC3 Interoffice Transport - Interzone Mile	\$ 43.27	Same as for Term.	Same as for Term.
284	OC12 Interoffice Transport - Urban Term.	\$ 6,238.18	\$ 577.06	\$ 297.74
285	OC12 Interoffice Transport - Suburban Term.	\$ 6,876.82	\$ 577.06	\$ 297.74
286	OC12 Interoffice Transport - Rural Term.	\$ 8,048.17	\$ 577.06	\$ 297.74
287	OC12 Interoffice Transport - Interzone Term.	\$ 9,894.49	\$ 577.06	\$ 297.74
288	OC12 Interoffice Transport - Urban Mile	\$ 111.49	Same as for Term.	Same as for Term.
289	OC12 Interoffice Transport - Suburban Mile	\$ 193.88	Same as for Term.	Same as for Term.
290	OC12 Interoffice Transport - Rural Mile	\$ 793.63	Same as for Term.	Same as for Term.
291	OC12 Interoffice Transport - Interzone Mile	\$ 173.08	Same as for Term.	Same as for Term.
292	OC48 Interoffice Transport - Urban Term.	\$ 18,867.84	\$ 692.08	\$ 320.28
293	OC48 Interoffice Transport - Suburban Term.	\$ 22,048.84	\$ 692.08	\$ 320.28
294	OC48 Interoffice Transport - Rural Term.	\$ 28,592.49	\$ 692.08	\$ 320.28

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NR/Rate 1st (13.1% CC)	Staff NR/Rate Add'l (13.1% CC)
295	OC48 Interoffice Transport - Interzone Term.	\$ 37,274.74	\$ 692.08	\$ 320.28
296	OC48 Interoffice Transport - Urban Mile	\$ 446.70	Same as for Term.	Same as for Term.
297	OC48 Interoffice Transport - Suburban Mile	\$ 776.23	Same as for Term.	Same as for Term.
298	OC48 Interoffice Transport - Rural Mile	\$ 2,812.12	Same as for Term.	Same as for Term.
299	OC48 Interoffice Transport - Interzone Mile	\$ 692.28	Same as for Term.	Same as for Term.
300	Dedicated Transport Cross Connect			
301	Voice Grade 2W	\$ 2.89	\$ 47.38	\$ 36.31
302	VG 4W	\$ 4.06	\$ 63.08	\$ 38.80
303	DS1	\$ 7.81	\$ 87.08	\$ 40.49
304	DS3	\$ 26.70	\$ 79.78	\$ 64.19
305	OC3*	\$ 80.00	\$ 233.77	\$ 116.32
306	OC12*	\$ 80.00	\$ 239.86	\$ 124.04
307	OC48*	\$ 80.00	\$ 246.09	\$ 133.42
308	Digital Cross-Connect System			
309	DS0 DCS Port*	\$ 2.33	\$ 41.34	None
310	DS1 DCS Port*	\$ 7.33	\$ 42.32	None
311	DS3 DCS Port*	\$ 199.46	\$ 42.32	None
312	DCS Establishment	None	\$ 1,289.06	None
313	Database Modification	None	\$ 95.33	None
314	Reconfiguration Charge	None	\$ 0.00	None
315	Multiplexing			
316	VG to DS1	\$ 81.16	\$ 96.94	\$ 48.61

Rate Schedule

	A	I	L	M
1				
2	UNE/Service	Staff Rec. Rate	Staff NRRate 1st (13.1% CC)	Staff NRRate Add'l (13.1% CC)
317	DS1 to DS3	\$ 266.11	\$ 777.61	\$ 439.79
318	SS7 Links - Cross Connect			
319	STP to Collo Cage - DS0	\$ 42.89	\$ 67.24	\$ 64.66
320	STP to Collo Cage - DS1	\$ 30.89	\$ 76.12	\$ 72.46
321	STP to SWBT TDF - DS0	\$ 42.89	\$ 67.24	\$ 64.66
322	STP to SWBT SDX Frame - DS1	\$ 30.89	\$ 76.12	\$ 72.46
323	Unbundled Signalling			
324	STP Access Connection 1.544 Mbps*	See Urban DS1 rates	None	None
325	STP Access Link 56 Kbps per link*	\$ 109.16	None	None
326	STP Access Link 56 Kbps per mile*	\$ 9.81	None	None
327	SS7 Transport per octet	\$ 0.00000031	None	None
328	SS7 Signaling Transport per call*	\$ 0.00008	None	None
329	STP Port per port	\$ 365.36	\$ 50.26	None
330	Point Code Addition per STP pair	None	\$ 12.67	\$ 12.67
331	GTT Addition - Simple	None	\$ 1.01	\$ 1.01
332	GTT Addition - Complex	None	ICB	ICB
333	Line Information Database - Validation and CNAM			
334	Validation Query	\$ 0.0000310	None	None
335	CNAM Service Query	\$ 0.0001142	None	None
336	Query Transport	\$ 0.0000643	None	None
337	Service Order Charge	None	\$ 2.69	None
338	Line Validation Administration System	\$ -	\$ -	\$ -
339	Toll Free Database per Message/Query			